

KSC/05.19.22  
JCM: USAO#2022R00063

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

KEITH L. BROWN,  
a/k/a CLOWN,

Defendant.

\* CRIMINAL NO. JKCB 22cr212  
\*  
\* (Possession with Intent to Distribute  
\* Controlled Substances, 21 U.S.C. §  
\* 841(a)(1); Forfeiture, 21 U.S.C. § 853,  
\* 28 U.S.C. § 2461)  
\*

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CRIMINAL INFORMATION

COUNT ONE

(Possession with Intent to Distribute Controlled Substances)

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND DEPUTY  
JK FILED \_\_\_\_\_ ENTERED  
LOGGED \_\_\_\_\_ RECEIVED

JUN 15 2022

The United States Attorney for the District of Maryland charges that:

On or about January 13, 2022, in the District of Maryland, the defendant,

**KEITH L. BROWN**

did knowingly and intentionally possess with the intent to distribute 100 grams or more of phencyclidine (“PCP”), a Schedule II controlled substance, as well as 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)

**FORFEITURE ALLEGATION**

The United States Attorney for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the Defendant's convictions.

**Narcotics Forfeiture**

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Count One, the Defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

**Substitute Assets**

3. Pursuant to 21 U.S.C. § 853(p), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the property charged with forfeiture in the paragraphs above.

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to, the following:
  - a. Approximately \$32,695 in U.S. currency seized on January 13, 2022 from various residences in connection with federal search and seizure warrants; and
  - b. a Smith and Wesson handgun with serial number: HEB8168 and a loaded magazine with approximately seven rounds seized pursuant to a federal search and seizure warrant from 1115 Madison Street, Apartment A1, Baltimore Maryland, on January 13, 2022.

Fed. R. Crim. P. 32.2  
21 U.S.C. § 853  
28 U.S.C. § 2461(c)

*Erek L. Barron / JCM*  
Erek L. Barron  
United States Attorney

June 15, 2022  
Date